

ENSV Inspection Transmittal Summary Report

Media:
RCRA

Inspection Type:
SEE- CEI

Inspection Date:
01/26/2016

Preliminary SNC Findings:

Inspector:
BRUCE CANOVA

Transmittal Date:

NOV / NOPV / NOPF:
No

Facility Name:
Elite Metal Finishing

FEB 11 2016

Address:
2501 Murray St Ste C
Sioux City
IA
51111

ID Number:
IAR000518837

Activity Number: MM Participating Programs:

Federal Activity:

Federal Facility:
No

Potential EJ:
No

SBREFA Provided:	Security Handout Provided:	MM Screening Completed:	EMS ISO 14001:	Compliance Officer:
Yes	No	Yes	No	BETH KOESTERER

Selection Criteria 1:

Selection Criteria 2:

ACS Code:

Inspection Findings:

No findings. Reduced HW Generator Status from SQG to CESQG.

Target Quality:

Bad. 2 employees.
1 Waste Stream from 1 Process.
CESQG.

RCRA



548903

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

ELITE METAL FINISHING

2501 Murray Street, Suite C
Sioux City, Iowa 51111
(712) 224-5599

EPA ID Number: IAR000518837

ON

January 26, 2016

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Environmental Sciences and Technology Division

1.0 INTRODUCTION

At the request of the Air and Waste Management Division, a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) was performed at Elite Metal Finishing (hereafter Elite), located in Sioux City, Iowa on January 26, 2016. The inspection was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the information necessary to determine compliance with applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI. The CEI was conducted as a Level B Multi-Media Inspection, with the Region 7 Multi-Media Screening Checklist included as Attachment 1.

2.0 PARTICIPANTS

Elite:

Cindy Zeman, Director of Human Resources (six years with company and in present position)
Brandon Lamere, Production Lead (two years with company and in present position)

U.S. Environmental Protection Agency (EPA):

Bruce Canova, Civil Investigator (NOWCC/SEE)

3.0 INSPECTION PROCEDURES

Prior to beginning the CEI, I conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent roadways. I identified no environmental issues or concerns during this preliminary examination. Upon arriving unannounced at the facility at 9:00 a.m., I introduced myself to the Office Receptionist and explained the reason for my visit. I asked to speak to Ms. Cindy Zeman, the site contact listed on the EPA RCRA Handler Information Report (Attachment 2). I met Ms. Zeman in the front lobby, presented her with my EPA credentials, explained the purpose and procedures of the inspection, and accompanied her to a conference room. We were joined during the visual inspection by Mr. Lamere. I presented Ms. Zeman with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented her with a copy of Title 18 U.S. Code, Sections 1001 and 1002. Ms. Zeman was made aware of her confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make or not make a confidentiality claim. During the CEI, Ms. Zeman and Mr. Lamere acted as the official facility representatives.

The inspection focused on waste stream generation management and verification of RCRA hazardous waste generator status. I conducted a visual inspection of the (1) Electro-Polishing Area; (2) Hazardous Waste Accumulation Area; (3) General Storage Area; and (4) Outside Facility Perimeter. See Attachment 3 for the Facility Diagram. Document photocopies and photographs were additionally collected as inspection documentation (attachments 1-9 and photos 1-2 with attached photo log). Information collected during the inspection is documented on the EPA Inspection Checklist (Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently.

At the conclusion of the inspection, I summarized my findings and recommendations with Ms. Zeman. I provided Ms. Zeman with a Confidentiality Notice (Attachment 5) and a Receipt of Documents and Samples (Attachment 6), which she signed as acknowledgement of receipt. No confidentiality claims were made by Elite. No findings were observed at the time of the CEI, therefore a *Notice of Preliminary Findings* was not provided to Ms. Zeman.

The following inspection documents and compliance assistance handouts were left with Elite:

- RCRA Section 3007(a)
- Title 18 U.S. Code, Sections 1001 and 1002
- EPA RCRA Handler Information Report
- Confidentiality Notice (Original page of the completed carbonless transfer set)
- Receipt of Documents and Samples (Original page of the completed carbonless transfer set)
- U.S. EPA Small Business Resources Information Sheet
- U.S. EPA Publication, *Managing Your Hazardous Waste*
- IDNR Waste Exchange Brochure
- IDNR Pollution Prevention Services Packet with Inserts
- University of Northern Iowa Onsite Review Brochure

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Elite is privately owned and began operations in late 2012, providing electro-polishing services of aluminum and stainless steel parts for Industrial Design Fabrication and Installation (IDFI), located in the same building. Elite encompasses approximately 4,800 square feet, with two production personnel working from 7:00 a.m. to 3:30 p.m. Monday through Friday. Raw materials used include sulfuric acid, phosphoric acid, and sodium hydroxide. These are received in 55-gallon steel and polyethylene containers, and stored in the General Storage Area. Additional information is available at www.elitemetal.com.

4.2 Facility RCRA Status

Prior to this CEI, Elite had not been inspected for RCRA compliance. According to the EPA RCRA Handler Information Report, Elite notified as a Small Quantity Generator (SQG) of D007 characteristic hazardous waste on January 17, 2014. I provided Ms. Zeman with the EPA RCRA Handler Information Report, which she reviewed and made the following changes: (1) added D002 waste code to the Hazardous Wastes Handled section and (2) changed the facility's hazardous waste generator status from a SQG to a Conditionally Exempt Small Quantity Generator (CESQG) of Hazardous Waste. Based on my review of the facility's hazardous waste generation rate (less than 220 pounds of non-acute hazardous waste generated per month), I determined Elite to be CESQG of D002 and D007 characteristic hazardous waste. In addition, I determined Elite to be a small quantity handler of universal waste-lamps.

4.3 Facility Waste Streams and Management

Residue from Electro-Polishing Process (Residue) - Elite generates approximately 110 pounds of residue per month from the electro-polishing of metal parts, using a five-tank sulfuric acid, phosphoric acid, and sodium hydroxide immersion process. The electro-polished parts are water-rinsed and drained in the final rinse tank (Photo 1). Elite has determined the process residue to be hazardous, based on product and process knowledge. The residue settles to the bottom of the 846-gallon capacity middle tank in the electro-polishing system (Photo 2). The waste chromium, acid, and sodium hydroxide solution in the middle tank is drained once per year into 275-gallon capacity polyethylene holding tanks, and the remaining residue collected in a 55-gallon container near the immersion tanks. The solution is then returned to the middle tank for reuse. The 55-gallon container of residue is housed within an 85-gallon polyethylene container, which serves as secondary containment. The residue is disposed by Clean Harbors (Deer Trail, Colorado) as D002 and D007 characteristic hazardous waste (Attachments 7, 8, and 9-Uniform Hazardous Waste Manifests #004130593 and #005048175 and LDR Notification Form #217172329). In the Hazardous Waste Accumulation Area, I observed one 1/3 full 55-gallon container of residue inside an 85-gallon polyethylene container. The 55-gallon container was in good condition, closed, and labeled with the words "Hazardous Waste." I reviewed the management of the residue and no findings were noted.

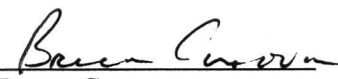
Universal Waste Lamps - Ms. Zeman estimates that Elite generates one or two universal waste-lamps per year. The spent lamps are replaced as needed, and recycled by Sioux City Lighting under contract with the building owner. At the time of the CEI, I did not observe any universal waste lamps being generated or stored on-site. I reviewed the management of the universal waste lamps and no findings were noted.

General Trash - The general trash consists of waste paper, cardboard, banding material, and floor sweepings. The general trash is collected in a two-yard dumpster, picked up weekly by Waste Management Services (Sioux City, Iowa), and disposed in the Sioux City Sanitary Landfill. I reviewed the management of the general trash and no findings were noted.

Outside Facility Perimeter - I inspected the outside perimeter of the facility and observed no storage tanks, containers, or stored waste. No findings of the outside facility perimeter were noted.

5.0 SUMMARY

During the course of the inspection, I observed no issues or potential findings. However, further EPA review may include findings.


Bruce Canova
Civil Investigator
Date: 2/5/2016

Attachments:

- 1) Region 7 Multi-Media Screening Checklist (2 pages)
- 2) EPA RCRA Handler Information Report (1 page)
- 3) Facility Diagram (1 page)
- 4) EPA Inspection Checklist (5 pages)
- 5) Confidentiality Notice (1 page)
- 6) Receipt for Documents and Samples (1 page)
- 7) Uniform Hazardous Waste Manifest #004130593 (2 pages)
- 8) Uniform Hazardous Waste Manifest #005048175 (2 pages)
- 9) Safety-Kleen Land Disposal Restriction Notice #217172329 (1 page)

Photo Log (1 page)

Photographs (2 pages/2 photos)

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: ELITE METAL FINISHING Inspector: BRUCE ANONA
 Facility Ownership: SAME Primary Media: RCRA
 Street: 2501 MURRAY ST, SUITE C Inspector Phone Ext.: 7888
 City: SIOUX CITY State: IA Zip: 51111 Date: 1-26-2016
 Phone: 712 224-5599 Facility Contact: CINDY ZEMAN SIC/NAICS Code: 332813
 Number of Employees: 2 Work Hours/Shifts: 7-3:30 M-F Facility Subject to OSHA regulations Yes ☒ No ☐

Main facility activity, major process chemical(s) & description: ELECTROPOLISHING METAL PARTS FOR INDUSTRIAL DESIGN FABRICATION & INSTALLATION (IDFI)

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐, printing ☐, reacting ☐, formulating ☐, distilling ☐, water treatment ☐, refrigeration ☐, manufacturing ☐, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☐, combustion (boiler, furnaces, oxidizers) ☐, plating (chrome ☐, other ELECTROPOLISHING IN DIPTANKS

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
 If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ Forward to EJ

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ Forward to EPCRA
 2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ Forward to EPCRA
 3. Has the facility: If any box in question 3 is marked - Forward to EPCRA
 a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☐, at any time over the last 2 years? ☐
 b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
 c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☐
 d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
 4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ Forward to TSCA and ask Has facility tested oil filled equipment to determine PCB content? No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - Get Photo

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
 If yes, are all wastewater discharges permitted? Yes ☐ No ☐ Forward to CWA
 2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐
 If yes, are the discharges permitted by: State? ☐, City? ☒ - If yes, Stop here. No ☐ Forward to CWA
 If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ Forward to CWA
 3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
 If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ Forward to CWA
 4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (Get Photo) Forward to CWA
 5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
 If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (Get Photo) FWD to Wetlands

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ Forward to UIC
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ Forward to PWS
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ Forward to CAA
Source: _____ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
If yes, is equipment permitted? Yes ☐ No ☐ Forward to CAA Describe: _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ Forward to CFC
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: _____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ Forward to EPCRA/RMP
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ Forward to CFC

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☒ (stop) Yes ☐
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ Forward to RCRA
2. Is hazardous waste treated ☐, stored >90-days ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐?
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ Forward to RCRA
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☐
Material Claimed To Be Non-Hazardous _____
N/A

- How does the facility know these wastes are non-hazardous?
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA
4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ Forward to RCRA
Describe: _____ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ Forward to RCRA
Describe: _____ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ Forward to RCRA & EPCRA Describe: _____ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ Forward to UST
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ Forward to UST

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☒ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ Forward to SPCC
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ Forward to SPCC
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) Forward to SPCC

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☒ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☒ Yes ☐

* PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS

Version 08.23.05a

GRAY SHADED AREAS INDICATE ITEMS YOU NEED TO LOOK FOR DURING VISUAL INSPECTION

HANDLER INFORMATION REPORT

October 19, 2015

Procedures for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Beth Koesterer, AWMD/WEMM.

EPA RCRA ID Number: IAR000518837

Name of Company/Site: ELITE METAL FINISHING
Location of Site: 2501 MURRAY ST STE C
SIOUX CITY, IA 51111
WOODBURY County

Land Type: Private

NAICS: 332813 - ELECTROPLATING, PLATING, POLISHING, ANODIZING, AND COLORING

Mailing Address: 2501 MURRAY ST STE C
SIOUX CITY, IA 51111

Site Contact: CINDY ZEMAN
Job Title: DIRECTOR OF HUMAN RESOURCES
Address: 2501 MURRAY ST STE C
SIOUX CITY, IA 51111
Email: CZEMAN@IDFI.COM
Phone Number: 712-224-5599 233

Current Owner of Site: TODD JAGER
Phone Number: 712-224-5599
Owner Type: Private

Current Owner of Site: TONY DERRICK
Phone Number: 712-224-5599
Owner Type: Private

Current Operator of Site: ELITE METAL FINISHING
Phone Number: 712-224-5599
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: Federal Small Quantity Generator CESQG (PC)

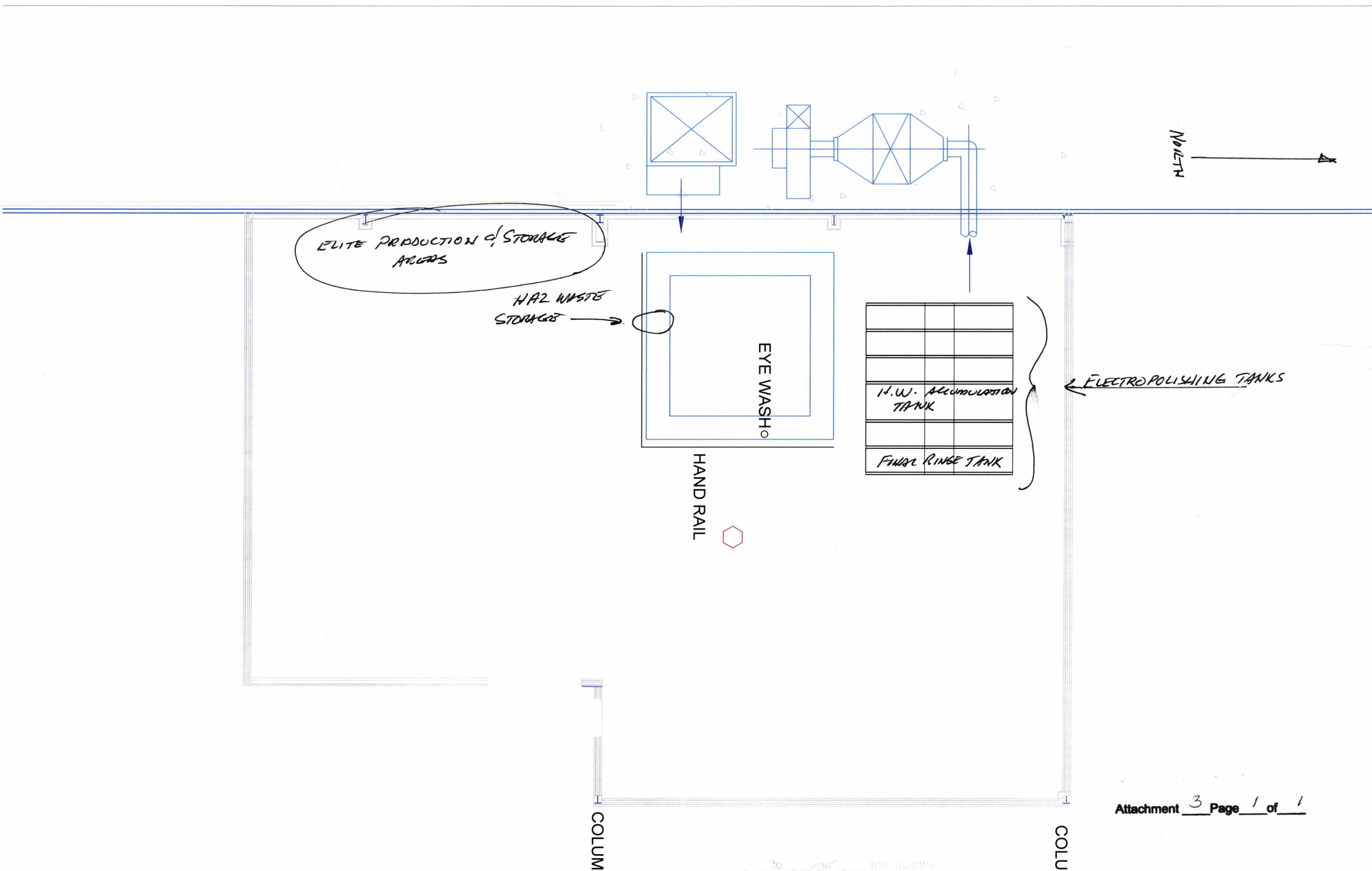
Hazardous Wastes Handled: D007

N 01/27/14 2

ADD: D002 (PC)

Certified by Notification on 01/27/14 by
CINDY ZEMAN 01/23/14
DIRECTOR OF HUMAN RESOURCES

Date of Site Visit: 1-26-16Name of Inspector (Please print): BRUCE CANOVA(Check one): ☐ EPA R7 ENST ☐ EPA R7 Contractor ☒ NOWCC/SEE InvestigatorSignature of Inspector: Bruce Canova



North →

ELITE PRODUCTION & STORAGE AREAS

HAZ WASTE STORAGE →

EYE WASH

HAND RAIL

← ELECTROPOLISHING TANKS

COLUM

COLU

Facility: ELITE METAL FINISHING Date: 1/26/2016 Arrival Time: 9:00 AM
Address: 2501 MURRAY ST City/State: _____ Zip: _____
SIOUX CITY, IA 51111

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

Facility Orientation

N

2. Determine direction "North" with respect to facility, and provide a brief layout and orientation sketch (as can be viewed from the public right-of-way).

SEE FACILITY
DIAGRAM

3. Obvious concerns visible from public right-of-way? ☐ Yes ☒ No

Photos taken? ☐ Yes ☒ No

- N/A {
- | | |
|--|---|
| <input type="checkbox"/> Containers | <input type="checkbox"/> Tanks |
| <input type="checkbox"/> Loading / Unloading areas | <input type="checkbox"/> Processing Equipment |
| <input type="checkbox"/> Open Drums | <input type="checkbox"/> Security Devices |
| <input type="checkbox"/> Unusual Odors | <input type="checkbox"/> Stressed Vegetation |
| <input type="checkbox"/> Safety Concerns | <input type="checkbox"/> Obvious Discharges |
| | <input type="checkbox"/> Unusual Staining |
| | <input type="checkbox"/> Improper Disposal |
| | <input type="checkbox"/> Other Concerns _____ |

SITE ENTRY & IN-BRIEFING

1. ☒ Used main entrance ☒ Entered during normal business hours

2. ☒ Presented credentials ☒ Presented RCRA § 3007 & explained authority to conduct inspections.
☒ Explained facility's responsibility to provide accurate information & provided copies of U.S.C. §§ 1001 & 1002 to facility representative.

3. Facility representative: CINDY ZEMAN Title: DIR - HR IDFI
How long with this company? 6 YRS How long in current position? 6 YRS

Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

Facility representative: BRANDON LAMERE Title: PRODUCTION LEAD

How long with this company? 2 YRS How long in current position? 2 YRS

Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

4. Introduction:

☒ Verified correct facility address, EPA ID#, & contact info. on Handler Information Report.

☒ Explained purpose, scope, and order of inspection. ☒ Requested facility layout diagram

☒ Explained documentation process (worksheets, checklists, photos, notes, statements, etc.)

☒ Explained facility's right to claim CBI > inspection. CBI concerns at this time? ☐ Yes ☒ No
CBI concerns / protocol: _____

☒ Identified personal safety considerations (PPE, etc.) EYES ONLY

5. Was full access granted ☒ Yes ☐ No

☒ By facility representative ☐ Other (name & title): _____

☐ Excessive delays occurred (>15 minutes = denial of access) ☐ Yes ☒ No

☐ Access denied or limited. By whom?

N/A Name: _____ Title: _____ Time of denial: _____

Reason(s) for denial or limitations placed on access: N/A

EXIT BRIEFING

Facility: ELITE METAL FINISHING Date: 1/26/2016 Time Left Facility: 1:30 PM

1. Completed **Multi-Media Screening Checklist**? ☒ Yes ☐ No

N/A 2. Reviewed all data collected & documented all ~~concerns and preliminary findings~~? ☐ Yes ☐ No

- ☐ **Location of preliminary findings**, type and amount of waste involved, time frame, frequency, & specific date(s) when started.
- ☐ **Illegal discharge**: Show location (diagram/photo), dimensions, conditions, distance to water or other sensitive environmental area, & other pertinent information. ☐ Shown as attachment(s)
- ☐ **Illegal disposal** (document each occurrence): ☐ Shown as attachment(s)
- **Quantity** disposed or shipped)
 - **How** disposed or shipped:
 - **When** disposed or shipped:
 - **Where** disposed or shipped:
 - **Who** disposed or shipped:

N/A 3. ☐ Identified/verified that violations from previous inspections were corrected (if applicable).

N/A 4. ☐ Addressed all unresolved inspection-related issues.

5. ☒ Confirmed **generator status** with facility representative(s). CEEOG

N/A 6. ☐ Summarized **preliminary findings** and observations for facility representative(s).

7. **NOPF(s) issued?** ☐ Yes ☒ No

- N/A { ☐ NOPF(s) clearly identified and explained, including location and applicable regulations.
- ☐ Explained importance of timely and adequate response within **14 days**. (**send to me**)
- ☐ Explained that NOPFs and observations are based on my current knowledge of RCRA, and that findings may differ upon further review by the EPA.
- ☒ Explained that compliance officer (CO) will make final compliance decisions and all compliance-related questions should be directed to him or her.
- ☒ Explained that **recommendations** are provided for **informational purposes only**, and **do not require** any **specific actions** by the facility at this time.
- ☒ Provided facility with completed **Document Receipt** form. ☒ Provided facility with **CBI** form.

8. Specific information requested from facility? ☒ Yes ☐ No SEE RECEIPT FOR DOCUMENTS

9. Provided/explained **SBREFA** and other applicable state & federal outreach material. ☒ Yes ☐ No

10. Facility appears to be aware of RCRA regs. and has own environmental staff. ☐ Yes ☒ No

11. Facility has copy of applicable RCRA regulations. ☐ Yes ☒ No

12. Attitude & demeanor of facility representative(s) ☒ OK ☐ Not OK

13. Exit Briefing Participants: CINDY ZUMAN

Comments: _____

1. Site History:

Property owner and facility operator the same? ☐ Yes ☒ No

4. Major manufacturing or process flow from raw to finished product, and waste streams produced.

5. Verified/compared above information with facility Notification Form: ☒ Yes ☐ No

Attachment 4 Page 3 of 5

RECORDS REVIEW & GENERATOR STATUS

MANIFESTS

✓ - in compliance X - not in compliance N/A - not applicable

#	✓ X N/A	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.	✓	Facility uses manifest system-262.20(a)(1)	<u>2014</u>
2.	✓	Manifests maintained for 3 years-262.40(a)	2/26 400 LB D002 (SODIUM HYDROXIDE)
3.	✓	Generator EPA I.D. number-262.20(a)	
4.	✓	Generator name, address, phone number-262.20(a)	2/26 320 LB D001 (MORPHOLINE (NO LONGER USED) SOLUTION)
5.	✓	Transporter(s) name & EPA I.D. number-262.20(a)	<u>1320</u> 1320 LB = 60 LB/MO
6.	✓	Designate facility name, address & EPA I.D. number-262.20(a)	
7.	✓	Signed and dated-262.23(a)	<u>2015</u>
8.	N/A	Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	9/16 1,320 LB D002, D007 (PHOSPHORIC ACID, SULFURIC ACID, CHROMIUM)
9.	N/A	Generator maintains copy of contractual agreement for at least 3 years after termination or expiration of the agreement (SQG only)-262.20(e)(2)	
10.	✓	LDR notification/certification sent with manifests on 1 st shipment-268.7(a)(2)	1,320 LB = 110 LB/MO
11.	✓	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7(a)(2)	
12.	✓	LDR notification/certification/waste analysis data & other documents maintained for 3 years-268.7(a)(8)	

13. Approximate number of manifests generated since last inspection, or over past 3 years: 6

14. Approximate number of manifests reviewed: 6

15. Copies of manifests made with regulatory violations? ☐ YES ☐ NO ☒ N/A

GENERATOR STATUS (based on records review of monthly generation rate)

- ☐ Non-generator
☒ CESQG (≤ 220 lb./mo non-acute HW, or ≤ 2.2 lb./mo. acute waste, and accumulates ≤ 220 lb/mo acute HW spill cleanup residue)
☐ SQG (>220 , but $< 2,200$ lb./mo non-acute HW, or ≤ 2.2 lb./mo acute waste, & accumulates ≤ 220 lb/mo acute HW spill cleanup residue)
☐ LQG ($\geq 2,200$ lb./mo non-acute HW, or >2.2 lb./mo. acute waste, and accumulates >220 lb/mo acute HW spill residue)

Is facility's status solidly within above category? ☒ YES ☐ NO (If "NO", carefully verify status and document)

GENERATOR WASTE STREAM WORKSHEET

LOCATION: PRODUCTION / ELECTROPOISHING AREA

OPERATION or PROCESS: ELECTRO-POISHING OF ~~LEAD~~ METAL PARTS

WASTE STREAM: CHROMIUM, PHOSPHORIC ACID, SULFURIC ACID, SODIUM HYDROXIDE **GENERATION RATE:** 110 LB/MO

FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing Documentation: _____

INFORMATION REQUESTED? SHIPPING MANIFESTS

WASTE CODES: D002, D007

ON-SITE MANAGEMENT: HW Satellite?? Size: 55 GAL How Full? _____

☒ Good Cond. ☒ Closed ☒ Labeled "HW" ☐ Dated _____ ☒ < 55 Gal. Near POG ☐

OFF-SITE MANAGEMENT OR DISPOSITION: CLEAN HARBORS - DODD TRAIL, CO

NOPE? _____

PHOTO # 1 : **FACING:** (N) E S W

SHOWING: ELECTRO-POISHING IMMERSION TANKS (5 TANKS)

MIDDLE TANK - RESIDUE COLLECTION

END TANK (RIGHT) - FINAL RINSE - WATER RE-USED

PHOTO # 2 : **FACING:** (N) E S W

SHOWING: MIDDLE RESIDUE COLLECTION TANK. TANK DRAINED & RESIDUE REMOVED 1X / YEAR. MANUAL RESIDUE REMOVAL

HW

NOTES: RESIDUE STORED IN 55-GAL INSIDE 85-GAL POLY SECONDARY CONTAINMENT - 1/3 FULL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>ELITE METAL FINISHING</i>	
Facility Address <i>2501 MURRAY ST, STE C SIOUX CITY, IOWA 51111</i>	
Inspector (print) <i>BRUCE CANOVA</i>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date <i>1/26/2016</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Cindy Zeman</i>	Signature/Date <i>Cindy Zeman 1/26/16</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested;

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name	ELITE METAL FINISHING
Facility Address	2501 MURRAY ST., STE C SIOUX CITY, IOWA 51111

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/ Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- ① UNIFORM HAZ WASTE MANIFESTS #005048175 (2 PAGES)
#004130591 (1 PAGE) ~~PL~~
#004130593 (2 PAGES)
#004130591 (2 PAGES)
- ② SAFETY-KLEEN LDR NOTIFICATION FORM #217172329 (1 PAGE)
- ③ FACILITY DIAGRAM (1 PAGE)

Facility Representative (print)	Signature/Date
Cindy Zeman	Cindy Zeman 01/26/16
Inspector (print)	Signature/Date
BRUCE CANOVA	Bruce Curran 1/26/2016
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219	

QSM

SK SHIP# 212460571

Z12512720 YU 232282

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CESQG	2. Page 1 of 2	3. Emergency Response Phone 1-800-460-1760	4. Manifest Tracking Number 004130593 SKS			
5. Generator's Name and Mailing Address Elite Metal Finishing 2501 Murray St SIOUX CITY Generator's Phone: IA 51111-1141				Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.				U.S. EPA ID Number TXR0000081205				
7. Transporter 2 Company Name RER Trucking				U.S. EPA ID Number MOR 000501973				
8. Designated Facility Name and Site Address CLEAN HARBORS DEER TRAIL LLC 100555 E HIGHWAY 36 DEER TRAIL, CO 80105 Facility's Phone: 970-386-2262				U.S. EPA ID Number COD991300484				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	
				No.	Type			
	1. RD, UN3266, WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S., (SODIUM HYDROXIDE), 8, PG II (D002)			1	DF	50	6	
	2.							
	3.							
4.								
13. Waste Codes								
14. Special Handling Instructions and Additional Information TSD:DR EL10296 CSG: 1332D								
24 HR EMERGENCY #1-800-460-1760 (SAFETY-KLEEN)								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offoror's Printed/Typed Name Cindy Zeman				Signature Cindy Zeman		Month 2	Day 26	Year 14
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name Richard Hez				Signature Richard Hez		Month 2	Day 26	Year 14
Transporter 2 Printed/Typed Name Mark Arneson				Signature Mark Arneson		Month 03	Day 03	Year 14
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number:								
18b. Alternate Facility (or Generator) U.S. EPA ID Number								
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator) Month Day Year								
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H132		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name Katie Hargrave				Signature Katie Hargrave		Month 13	Day 11	Year 14

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DSM

SK SHIP# 217172329

1502964881

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CES06	2. Page 1 of 2	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 005048175 SKS		
5. Generator's Name and Mailing Address Elite Metal Finishing 2501 Murray St Sioux City Generator's Phone: IA 51111-1141				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.				U.S. EPA ID Number TXR0000081205			
7. Transporter 2 Company Name AATCO				U.S. EPA ID Number MOR0000501981			
8. Designated Facility Name and Site Address CLEAN HARBORS DEER TRAIL, LLC 108555 E HIGHWAY 36 DEER TRAIL, CO 80105 Facility's Phone: 970-386-2262				U.S. EPA ID Number COD991300484			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. UN2922, WASTE CORROSIVE LIQUIDS, TOXIC, N.O.S., (CHROMIUM), 8, (6.1), PG II	1	DM DF	40	G	D002 D007
	X	2. UN2922, WASTE CORROSIVE LIQUIDS, TOXIC, N.O.S., (CHROMIUM), 8, (6.1), PG II	1	DM DF	50	G	D002 D007
	X	3. UN2922, WASTE CORROSIVE LIQUIDS, TOXIC, N.O.S., (PHOSPHORIC ACID, SULFURIC ACID), 8, (6.1), PG II	1	DM DF	50	G	D002 D007
	X	4. UN2922, WASTE CORROSIVE LIQUIDS, TOXIC, N.O.S., (CHROMIUM), 8, (6.1), PG II	1	DM DF	200	G P	D002 D007
14. Special Handling Instructions and Additional Information TSD:DR 68154389 EL18296 CS6: 273881D 1) ERG#154; 2) ERG#154; 3) ERG#154; 4) ERG#154; 24 HR EMERGENCY #1-800-468-1760 (SK / TFI) AUTH AS "AGENT FOR" BY GEN TO RETAIN LICENSED SUB-CARRIERS AS NECESSARY							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Cindy Zeman		Signature Cindy Zeman		Month 19		Day 10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name Richard L. Hertz		Signature [Signature]		Month 19		
Transporter 2 Printed/Typed Name James Cayton AATCO		Signature [Signature]		Month 19			
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H132		2. H132		3. H132		4. H132	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Dorice Musgrave		Signature [Signature]		Month 19		Day 10	

DESIGNATED FACILITY TO GENERATOR
Attachment 8 Page 2 of 2

PLANT: DSM SAFETY-KLEEN 09/14/2015 PAGE:1
GENERATOR NAME: Elite Metal Finishing LDR NOTIFICATION FORM 05:36:02
MANIFEST NO.: 005048175645
OR SALES SERVICE NO.:
SK Shipping #: 217172329 CUST#: EL18296
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste
restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: 1009411
SKDOT#: 7623584

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D002 CCW CORROSIVE CHARACTERISTIC WASTES
D007 TCLP TOXICITY BASED ON TCLP (SW846)

Treatability group: NNW Non-Waste Water

Waste Constituent Notification:

Legend

Number	Constituent
247	ARSENIC
248	BARIUM
255	LEAD
259	SELENIUM

LDR FORM LINE NO: 2 MANIFEST PAGE/LINE# 01/002 SKPRFL NO: 1009612
SKDOT#: 7619540

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D002 CCW CORROSIVE CHARACTERISTIC WASTES
D007 TCLP TOXICITY BASED ON TCLP (SW846)

Treatability group: NNW Non-Waste Water

Waste Constituent Notification:

Legend

Number	Constituent
248	BARIUM
255	LEAD

LDR FORM LINE NO: 3 MANIFEST PAGE/LINE# 01/003 SKPRFL NO: 1009655
SKDOT#: 7646220

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D002 CCW CORROSIVE CHARACTERISTIC WASTES
D007 TCLP TOXICITY BASED ON TCLP (SW846)

Treatability group: NNW Non-Waste Water

Waste Constituent Notification:

Legend

Number	Constituent
247	ARSENIC
248	BARIUM
255	LEAD

LDR FORM LINE NO: 4 MANIFEST PAGE/LINE# 01/004 SKPRFL NO: 1063423
SKDOT#: 7662755

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D002 CCW CORROSIVE CHARACTERISTIC WASTES
D007 TCLP TOXICITY BASED ON TCLP (SW846)

Treatability group: NNW Non-Waste Water

Waste Constituent Notification:

Legend

Number	Constituent
247	ARSENIC
248	BARIUM
251	CHROMIUM (TOTAL)
255	LEAD

NOTES

GENERATOR'S AUTHORIZED

SIGNATURE

PLANT: DSM

TOP COPY: GENERATOR

NAME & TITLE

(PRINTED OR TYPED)

CSG:

REF#:

MIDDLE COPY: FACILITY

DATE

SW:

BOTTOM COPY: TRANSI

PHOTO LOG

Facility Name/City/State/Zip: Elite Metal Finishing / 2501 Murray Street, #C / Sioux City, IA 51111

Facility ID #: IAR000518837

Date: January 26, 2016

Photographer: Bruce Canova 

Type of Camera: Nikon Coolpix AW100, Serial #: 32167674

Digital Recording Media: Flashcard

All digital photos were copied by: Bruce Canova on January 26, 2016

All digital photos were copied to: CD-R

Original copy is stored in: CD-R Digital photos were downloaded to CD-R by Bruce Canova.

No changes were made in the original image files prior to storage on the CD-R.

Report Photo#	Photographer	Date	Approx. Time	File Name (DSCN0xxx.jpg)	Description
1	Bruce Canova	1/26/16	10:05 AM	529	Production Area, showing electro-polishing immersion tanks, with residue accumulation tank in center (yellow arrow) and final rinse tank on right (blue arrow). Photo taken facing north.
2	Bruce Canova	1/26/16	10:09 AM	530	Production Area, showing center electro-polishing immersion tank where residue accumulation occurs. Tank is drained and residue removed annually. Electro-polishing solution is reused.

**Elite Metal Finishing
2501 Murray Street
Sioux City, Iowa 51111
ID #IAR000518837**

RCRA CEI Photos

Photos taken by Bruce Canova

Bruce Canova

on

January 26, 2016

Elite Metal Finishing January 26, 2016

Production Area, showing electro-polishing immersion tanks, with residue accumulation tank in center (yellow arrow) and final rinse tank on right (blue arrow). Photo taken facing north.

Photo 1

Bruce Canova

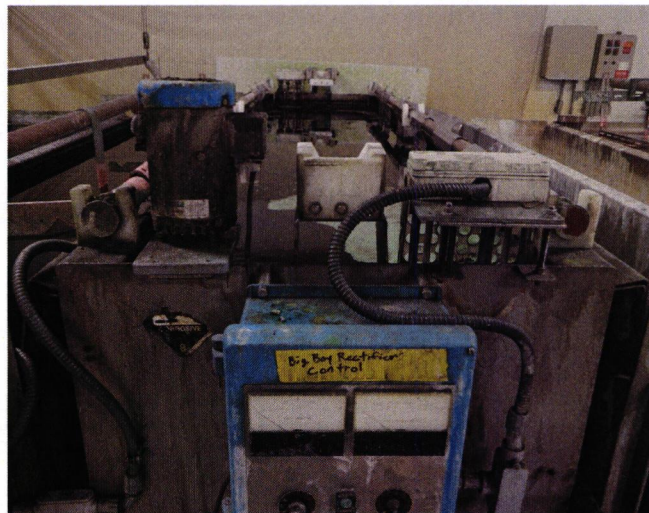


Elite Metal Finishing January 26, 2016

Production Area, showing center electro-polishing immersion tank where residue accumulation occurs. Tank is drained and residue removed annually. Electro-polishing solution is reused.

Photo 2

Bruce Canova



DOCUMENT CONTROL CHECK SHEET

Media

Air	RCRA	Water	Other
	✓		

Date of Inspection: January 26, 2016

Facility ID Number: IAR000518837

Facility Name and Address: Elite Metal Finishing
2501 Murray Street
Sioux City, Iowa 51111

The following documents pertaining to this activity are contained in the package:

<u>Document</u>		<u>Yes</u>	<u>No</u>	<u>NA</u>
Final Report with attachments	<u>24 d/c</u> <u>21</u> Pages	(✓)	()	()
Field sheets	____ Pages	()	(✓)	()
Chain of Custody	____ Pages	()	(✓)	()
Field notes (see CEI Checklist-attachment 3)	____ Pages	()	(✓)	()
Analytical data sheets	____ Pages	()	(✓)	()
Photographic CD (if applicable)		(✓)	()	()
Photographs (not included in this report)	____ Photos	()	()	()
Pre-inspection documents	____ Pages	()	(✓)	()
Other documents (list below)				
_____	____ Pages			
_____	____ Pages			
_____	____ Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side)

CERTIFICATION

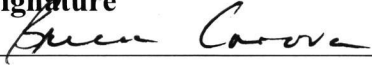
I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Brian Cresson
Activity Leader's Signature

February 5, 2016
Date Signed

DIGITAL IMAGE CHAIN OF CUSTODY FOR "ARCHIVAL" ORIGINAL IMAGES

IMAGE RECORD

Name Elite Metal Finishing	Facility EPA ID IAR000518837
Date Photos Taken January 26, 2016	Image Numbers For This Incident 2
Location Photos Taken 2501 Murray Street / Sioux City, IA / 51111	These images have not been changed, altered, or manipulated in any way.
Comments	Signature 

ACCESS RECORD

Name	Organization/Division	Phone Number	Signature
Note – R7 Records Center maintains these records			



